

REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-24 are pending in the present application. Claims 1-5, 7-12, 14-20, and 22-24 have been amended by the present amendment.

In the outstanding Office Action, Claims 8, 22, and 24 were rejected under 35 U.S.C. § 112, second paragraph; Claims 1, 2, 4, 7-9, 11, 14-17, 19, and 22-24 were rejected under 35 U.S.C. § 102(e) as anticipated by Kurozasa; Claims 3, 10, and 18 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kurozasa in view of Iwase et al.; and Claims 5, 6, 12, 13, 20, and 21 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kurozasa in view of Nakajima et al.

Applicants thank the Examiner for the courtesy of an interview extended to Applicants' representatives on August 27, 2003. During the interview, the rejections noted in the outstanding Office Action were discussed. No agreement was reached, pending the Examiner's further review when a response is filed.

Regarding the rejection of claims under 35 U.S.C. § 112, second paragraph, Claims 8, 22, and 24 have been amended in light of comments in the outstanding Office Action.

Accordingly, it is respectfully requested this rejection be withdrawn.

Claims 1, 2, 4, 7-9, 11, 14-17, 19, and 22-24 were rejected under 35 U.S.C. § 102(e) as anticipated by <u>Kurozasa</u>. This rejection is respectfully traversed.

Amended Claim 1 is directed to an image processing apparatus including at least one image reading unit which reads first image data, an image memory control unit which writes/reads a second image data, an image processing unit which processes the first and second image data to obtain a third image data, an image writing unit which prints the third image data, and an image data control unit. The image data control unit receives at least one

of the first, second, and third image data, and transmits received image data to any one of the image memory control unit, the image processing unit, and the image writing unit. The image memory control unit is commonly used by a plurality of applications including at least one of a facsimile application, a scanner application, a printer application, and a copier application. Amended independent Claims 7, 14, 22, and 24 include similar features.

In a non-limiting example, Figures 1, 2, and 19 illustrate an embodiment of the claimed image processing apparatus. The image processing apparatus includes an image memory control unit 102, which includes a memory module 222 and an image memory access control unit 221. Further, the image processing apparatus in this example includes an image read unit 101 (i.e., scanner application), which includes a read unit 201 and a sensor board unit 202. In addition, the image processing apparatus in this example includes an image write unit 104 (i.e., printer application), which includes a video data control unit 205 and an image formation unit (engine) 206. In addition, the image processing apparatus in this example also includes an image data control unit 203 (i.e., copier application), a facsimile control unit 224 (i.e., facsimile application), and an image processor 204. The image data control unit 203 and the facsimile control unit 224 are each connected to the image memory control unit 102 via a parallel bus 220. Each of the image read unit 201, the image processor 204, and the image write unit 104 are connected to the image memory control unit 102 via the image data control unit 203. Thus, the image memory control unit 102 is commonly used by a plurality of applications including a facsimile application (i.e., facsimile control unit 224), a scanner application (i.e., image write unit 104), and a copier application (i.e., image data control unit 203).

On the contrary, <u>Kurozasa</u> does not disclose an image memory access control unit that is commonly used by a facsimile application, a scanner application, a printer application, and a copier application. Rather, in Figure 4, <u>Kurozasa</u> illustrates a main control unit 440, a

printer control unit 430, an image reader control unit 420, and an operational panel control unit 410, but does not disclose a facsimile application or an image memory access control unit that is commonly used by a plurality of applications. Thus, <u>Korozasa</u> does not teach or suggest an image memory access control unit that is commonly used by a plurality of applications including at least one of a facsimile application, a scanner application, a printer application, and a copier application, as in the claimed invention.

Accordingly, it is respectfully submitted independent Claims 1, 7, 14, 22, and 24, and each of the claims depending therefrom, are allowable.

Claims 3, 10, and 18 were rejected under 35 U.S.C. § 103(a) as unpatentable over Kurozasa in view of Iwase et al. This rejection is respectfully traversed.

Claims 3, 10, and 18 depend on Claims 1, 7, and 14, respectively, which as discussed above are believed to be allowable. Further, it is respectfully submitted <u>Iwase et al.</u> also does not teach or suggest the features recited in the independent claims. Accordingly, it is respectfully requested this rejection be withdrawn.

Claims 5, 6, 12, 13, 20, and 21 were rejected under 35 U.S.C. § 103(a) as unpatentable over <u>Kurozasa</u> in view of <u>Nakajima et al</u>. This rejection is respectfully traversed.

Claims 5 and 6 depend indirectly on Claim 1, Claims 12 and 13 depend indirectly on Claim 7, and Claims 20 and 21 depend indirectly on Claim 14. Further, Claims 1, 7, and 14 are believed to be allowable as discussed above, and it is respectfully submitted Nakajima et al. also does not teach or suggest the features recited in the independent claims. Accordingly, it is respectfully requested this rejection also be withdrawn.

In addition, Applicants respectfully note the Official Filing Receipt is missing the names of the following two Applicants: Rie ISHII and Takeharu TONE. The names of these

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Applicants should immediately follow Takako SATOH in the list of Applicants.

Accordingly, Applicants respectfully request a corrected Official Filing Receipt.

In addition, the specification has been amended to correct minor informalities. It is believed no new matter has been added.

In addition, Claims 2-5, 8-12, 15-20, and 23 have been amended to better comply with U.S. claim drafting practice. It is believed no new matter has been added.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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